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EXECUTIVE SECRETARY

January 24, 2001

VIA HAND DELIVERY

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

***Re: Rulemaking Amendments of Regulations for Telephone Service Providers
Docket No.00-00873.***

Dear Mr. Waddell:

Enclosed please find the original and thirteen (13) copies of the Workshop II Comments of Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tellico Telephone Company, Inc., and Tennessee Telephone Company pursuant to Appendix A of the January 4, 2001 Notice of Workshops.

If you have any questions, please do not hesitate to contact me.

Best regards.

Very truly yours,



R. Dale Grimes

RDG/gci
Enclosures

cc: Service List
Mr. Bruce Mottern
Ms. Linda Lowrance

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
RULEMAKING AMENDMENTS OF REGULATIONS FOR TELEPHONE SERVICE PROVIDERS)))))	Docket No. 00-00873

**WORKSHOP II COMMENTS OF CONCORD TELEPHONE EXCHANGE, INC.,
HUMPHREYS COUNTY TELEPHONE COMPANY, TELlico TELEPHONE
COMPANY, INC., AND TENNESSEE TELEPHONE COMPANY**

Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tellico Telephone Company, Inc., and Tennessee Telephone Company, (collectively, "TDS TELECOM"), by their attorneys, respectfully submit their comments for Workshop II in the matter of Amendments to Chapter 1220-4-2, Regulations for Telephone Telecommunications Service Providers. TDS TELECOM reserves the right to comment further on specific rules during the workshop.

I. PROPOSED RULES SHOULD ESTABLISH MINIMUM QUALITY OF SERVICES STANDARDS.

Many of the proposed rules slated for review during Workshop II codify standards that are in fact already met and/or exceeded by the existing tariffs and practices of the industry. For instance, the Local Service Guarantee Credit in TDS TELECOM's tariffs currently exceeds the requirements of proposed rule 1220-4-2-.04 Customer Refunds for Service Outages. TDS TELECOM's commitment to providing quality service to its customers has flourished throughout its business practices without the need for more stringent regulation. The effect of additional regulatory requirements will only serve to limit the company's flexibility to tailor its business practices to best meet the needs of its particular customers. As outlined in its previous

comments, TDS TELECOM is not aware of any significant service quality issues that warrant the need for additional regulations.

II. PROPOSED RULES SHOULD ESTABLISH GENERAL REGULATIONS FOR ALL TELECOMMUNICATIONS SERVICE PROVIDERS.

As previously established in its Workshop I comments, TDS TELECOM believes that any regulations adopted in this proceeding should be consistently applied to all telecommunications providers in the state. For this reason, TDS TELECOM proposes the following revision:

1220-4-2-.07 Disconnection of Service to a Reseller by an Underlying Carrier

(1)(c) It is the responsibility of each reseller to notify its customers ~~either~~ in writing ~~or by voice communications~~ no less than ten (10) days prior of the pending disconnection of its service and advise its customers of their need to select another service provider.

It is the responsibility of all telecommunications providers, including resellers, to ensure that customers are properly notified prior to the disconnection of service. Elsewhere throughout the proposed rules concerning customer disconnect notification, such notification is required to be in written form. TDS TELECOM sees no reason to deviate from this standard in the case of a telecommunications reseller.

III. JOINT INDUSTRY RULE OBJECTION AND SUGGESTED REVISIONS.

As directed by the Authority in the December 15, 2000 Order Granting Motion in Part to Establish Workshops, TDS TELECOM has participated with other members of industry in an effort to reach consensus where possible on the proposed rules and suggested revisions thereto. TDS TELECOM has had opportunity to review the Industry Members Suggested Revisions for Workshop II and concurs in those comments and revisions as they represent common concerns of Tennessee's telecommunications providers.

IV. CONCLUSION.

In concluding, TDS TELECOM would reemphasize that the focus of this proceeding should be on developing minimum regulatory standards to be applied to all telecommunications service providers that will serve to safeguard quality telecommunications services for Tennessee consumers. TDS TELECOM is pleased with the spirit of cooperation exhibited during the first workshop and is confident that this objective can be reached with minimal additional burden placed on telecommunications service providers.

Dated: January 24, 2001

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R. Dale Grimes", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

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